

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHAEL REID a/k/a WAYNE MARTIN,

Plaintiff,

-against-

THE CITY OF NEW YORK, DETECTIVE KEVIN
GASSER (Tax ID 904007), DETECTIVE
BRAITHWAITE (Tax ID 880686), DETECTIVE MIKE
HOPKINS (Tax ID 911083), OFFICER WALTER
CONNOLLY (Shield #1217), JOHN/JANE DOES 1-5 (the
name “John/Jane Doe” being fictitious as the true name is
presently unknown) individually and in their official
capacity as employees of the City of New York,

Defendants.

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**DECLARATION OF
HANNAH V. FADDIS IN
SUPPORT OF
DEFENDANTS’ MOTION
FOR SUMMARY
JUDGMENT**

17-CV-5268 (RPK) (JRC)

HANNAH V. FADDIS, an attorney duly admitted to practice in the Courts of
New York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the
following statements are true:

1. I am an attorney in the Office of Muriel Goode-Trufant, Corporation Counsel of
the City of New York (“City”), and one of the attorneys assigned to represent defendants the
City of New York, Gasser, Braithwaite, Hopkins, and Connolly. As such, I am familiar with the
facts and circumstances stated herein and submit this declaration in support of Defendants’
Motions for Summary Judgment.

2. Annexed hereto as Exhibit “A” is a true and correct copy of the plaintiff’s
Amended Complaint (ECF No. 23).

3. Annexed hereto as Exhibit “B” is a true and correct copy of Defendants’ Answer
to the Amended Complaint. (ECF No. 26).

4. Annexed hereto as Exhibit “C” is a true and correct copy of the Deposition of Michael Reid held on June 26, 2018. (“Reid Dep. Tr.”)

5. Annexed hereto as Exhibit “D” is a true and correct copy of the Deposition of Michael Reid held on June 21, 2023. (“Reid Dep. Tr.”)

6. Annexed hereto as Exhibit “E” is a true and correct copy of excerpts of the Deposition of Det. Kevin Gasser held on July 11, 2019. (“Gasser Dep.Tr.”)

7. Annexed hereto as Exhibit “F” is a true and correct copy of excerpts of the Deposition of Det. Michael Braithwaite held on March 29, 2019. (“Braithwaite Dep. Tr.”)

8. Annexed hereto as Exhibit “G” is a true and correct copy of excerpts of the Deposition of Det. Michael Hopkins held on March 28, 2019. (“Hopkins Tr.”)

9. Annexed hereto as Exhibit “H” is a true and correct copy of excerpts of the Deposition of Officer Walter Connolly held on October 10, 2019. (“Connolly Tr.”)

10. Annexed hereto as Exhibit “I” is a true and correct copy of the Deposition of Steven Chaikin held on January 3, 2020. (“Chaikin Dep. Tr.”)

11. Annexed hereto as Exhibit “J” is a true and correct copy of the Deposition of Shereeda Maragh held on Nov. 5, 2019. (“Maragh Dep. Tr.”)

12. Annexed hereto as Exhibit “K” is a true and correct copy of the Deposition of Michael Walker held on March 24, 2022. (“Walker Dep. Tr.”)

13. Annexed hereto as Exhibit “L” is a true and correct copy of the photographs Mr. Walker was shown by an investigator on behalf of plaintiff. (“Walker Dep. Ex. C”).

14. Annexed hereto as Exhibit “M” is a true and correct copy of the Deposition of Marc Fliedner held on April 28, 2023, (“Fliedner Dep. Tr.”)

15. Annexed hereto as Exhibit “N” is a true and correct copy of excerpts of the NYPD Detective File produced in this matter. (“Det. File”).

16. Annexed hereto as Exhibit “O” is a true and correct copy of relevant memobook entries for Officer Connolly for November 27, 2005. (“Connolly Memo Book”).

17. Annexed hereto as Exhibit “P” is a true and correct copy of excerpts of the NYPD Crime Scene Unit File, Run 05-1339. (“CSU File”).

18. Annexed hereto as Exhibit “Q” is a true and correct copy of excerpts of the Kings County District Attorney’s Office trial file produced in this matter. (“KCDA Trial File”).

19. Annexed hereto as Exhibit “R” is a true and correct copy of the Kings County District Attorney’s Office Jeffrey Joseph file produced in this matter. (“KCDA Pierre-Joseph File”).¹

20. Annexed hereto as Exhibit “S” is a true and correct copy of excerpts of the criminal court file produced in this matter. (“Crim. Ct. File”).

21. Annexed hereto as Exhibit “T” is a true and correct copy of excerpts of the Appellate Advocate file produced in this matter. (“App. Adv. File”).

22. Annexed hereto as Exhibit “U” is a true and correct copy of excerpts of the Kings County District Attorney Conviction Review Unit file produced in this matter. (“CRU Box/CRU File.”)

23. Annexed hereto as Exhibit “V” is a true and correct copy of an undated memorandum by KCDA CRU produced in this matter. (“CRU DA Memo.”)

¹ Defendants have filed a request to file this exhibit under seal.

24. Annexed hereto as Exhibit “W” is a true and correct copy of email correspondence from Steven Chaikin including its attachment, dated October 29, 2019. (“Chaikin Email Corr.”)²

25. Annexed hereto as Exhibit “X” is a true and correct copy of the trial digest produced by Steven Chaikin on October 29, 2019, as printed and marked as Exhibit C at Mr. Chaikin’s deposition on January 3, 2020. (“Chaikin Trial Digest”).

26. Annexed hereto as Exhibit “Y” is a version of the Chaikin Trial Digest produced by plaintiff’s counsel on July 8, 2024. (“Chaikin 2024 Trial Digest”).

27. Annexed hereto as Exhibit “Z” is a true and correct copy of excerpts of the grand jury minutes for Ind. No. 4590/08.

28. Annexed hereto as Exhibit “AA” is a true and correct copy of a letter sent by Jeffrey Joseph to defense counsel dated July 1, 2019. (“Joseph Ltr., July 1, 2019”).

29. Annexed hereto as Exhibit “BB” is a true and correct copy of a letter sent by Jeffrey Joseph to defense counsel dated October 11, 2019. (“Joseph Ltr., Oct. 11, 2019”).

30. Annexed hereto as Exhibit “CC” is a copy of correspondence from Jeffrey Joseph dated June 21, 2016, produced by plaintiff’s counsel on June 7, 2024. (“Joseph 2016 Corr.”)

31. Annexed hereto as Exhibit “DD” is a copy of a letter from Jeffrey Joseph to plaintiff in 2014, produced by plaintiff’s counsel on Feb. 14, 2019. (“Joseph 2014 Ltr.”)

32. Annexed hereto as Exhibit “EE” is a copy of an affidavit executed by Shereeda Maragh on July 6, 2016, concerning the events of November 27, 2005, produced by plaintiff’s counsel on July 15, 2024. (“Maragh 2016 Aff.”)

² This exhibit will be provided electronically in its native format.

Dated: New York, New York
January 7, 2025

MURIEL GOODE-TRUFANT
Corporation Counsel of the
City of New York
*Attorney for Defendants City, Gasser, Hopkins,
Braithwaite, and Connolly*
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By: /s
Hannah V. Faddis
Special Federal Litigation Division

To: *All Counsel of Record*